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July 14, 2011

FOR SETTLEMENT PURPOSES ONLY

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Assistant Regional Counsel
Office of Regional Counsel
United States Environmental
Protection Bureau – Region 2
290 Broadway
New York, New York 10007-1866

Re: Cayuga County Groundwater Contamination Superfund Site
Summary of Potential Responsible Parties and Additional Contaminant Sources

Dear Carol:

This is in response to your June 28, 2011 e-mail request for additional information on Potentially Responsible Parties ("PRPs") for groundwater contaminant conditions detected within the area delineated as the Cayuga County Groundwater Contamination National Priorities List ("NPL") site. The opportunity to provide this information is appreciated and GE suggests that it is appropriate to work cooperatively to ensure that more of the parties who contributed to contaminant conditions detected within the NPL site area are either involved, or taken into account, with regard to response measures and/or cost recovery efforts at the NPL site.

As you probably know, the City of Auburn ("City") has historically been an area of significant industrial activity, and there were many companies that used TCE and other organic solvent chemicals in manufacturing operations. Some time ago, we conducted a review of documents from the New York State ("NYS") Department of Environmental Conservation ("DEC"), NYS Department of Health ("DOH"), County Health, County Engineering and

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Planning, City Engineering, City Industrial Development, United States Environmental Protection Agency ("US EPA"), and the Village of Union Springs. The documents confirmed a history of large industrial activities (past and present) in and near the City, up-gradient of the deep groundwater flow across the NPL site, along with residential development on former agricultural areas such as the residential developments on Bluefield Road, Experimental Drive and Overbrook Drive where former agricultural pesticide usage was likely practiced. (As US EPA knows, trichloroethene ("TCE"), tetrachloroethene ("PCE") and vinyl chloride ("VC") can be found as "inert" constituents in agricultural pesticides).

In addition, we developed "desk top" information on companies that the NYS DEC had identified as PRPs and potentially contributing to the conditions at the NPL site. Both in the past and the present, volatile organic compounds ("VOCs"), including TCE, were and are used, discharged and disposed of by local industries. Documents establish substantial pollutant discharges into the Owasco Outlet (a water-body that USEPA staff has suggested is hydraulically connected with deep groundwater flow), spills onto the ground, leaking industrial sewers, leaking underground storage tanks ("USTs"), contaminated dumpsites, possible "midnight dumping", septic tank failure(s), and off-site hauling of VOCs to, and disposal at, "unknown locations". Although the information attached to this correspondence is not exhaustive (but would justify additional information gathering by USEPA), it does review the universe of industrial use in the Auburn area and particularly at industries with a potential nexus to conditions detected within the NPL site.

After gathering the information on PRPs throughout the area, a map was developed that provided a visual mapping of the industrial facilities, the hundreds of gas wells, the commercial facilities and automotive repair facility locations, the junkyards and miscellaneous suspected waste disposal locations throughout and adjacent to the NPL Site. This map is being provided to you along with the other attachments and exhibits.

The PRP information is separated into three categories. The first attachment provides a description of the large industrial facilities that operated in the Auburn area and which have been found to have detectable contamination releases. The second is a more comprehensive list of companies historically using or handling hazardous substances and petroleum near the NPL site area. The last is a description of what we consider somewhat more general and "anecdotal" information of petroleum spills and dumping that may have taken place without any formal regulatory oversight or compliance reporting.

You will note that there is some overlap between the three attachments. But we also provide you with a substantial amount of records and documents that serve as the source of information used to put the three attachments together.

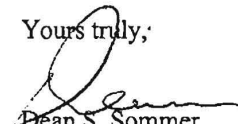
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Lastly, in some instances, because of the passage of time, we do not have possession of the documents from which some of the information is derived. But, if US EPA thought it was necessary to track down the source documents, we expect they could be obtained from the original sources again and/or obtained through US EPA information gathering statutory "tools". However, we have tried to attach some of the "backup" documentation that remained in our files and we will continue to look for additional "backup" information.

Nevertheless, it is respectfully suggested that the scope of PRP information is such that it is reasonable to make a determination that some/many PRPs, with a nexus to conditions found within the NPL site boundaries, are not yet "at the table". And, after reviewing this information, we hope US EPA will agree that, to the extent some of these companies are no longer viable entities, it is appropriate to still consider those entities in the resolution of US EPA's outstanding past cost demand.

Please let us know if you have any questions concerning the information set forth in the three attachments and the related backup documentation. After you have reviewed the information, perhaps we should have a meeting or conference call to begin discussions about the past cost claim and whether we can come to a negotiated resolution of the claim.

Yours truly,



Dean S. Sommer
James A. Muscato

cc: Donna Waniak
Paul Hare
Isabel Rodriques

ATTACHMENT DOCUMENT 1 – PRP DOCUMENTATION

SIGNIFICANT AUBURN INDUSTRIES THAT ARE POTENTIALLY RESPONSIBLE PARTIES

The largest concentration of industrial facilities is located along the Owasco River Outlet. (See Map "Location of Firms" interviewed, attachment 1.) There also are, or have been, industrial facilities in the western part of Auburn, including ALCO, Goulds Pump, Simplex Manufacturing, Auburn Tech/Bombardier, and Red Star trucking, and a number of industries on Columbus Street, which is north of, and becomes, Dunning Ave. (Climate Control, Cumberland Machinery, Singer/Remington, Columbian Rope), and on Genesee Street (Columbian Rope and Currier Plastics). The Industrial Park and a number of large facilities (E.D. Clapp, Auburn Steel/Austeel, and Hammond and Irving) are in the northern part of the City. Some of the older facilities are no longer in operation. A review of available records reflects the release of hazardous substances into the environment at a number of the facilities. To the extent that deep groundwater flows to the south, as determined during NPL site remedial investigation activities, such releases, if they reached the deeper aquifer, would have migrated into the NPL site. Unfortunately, it does not appear that these companies ever conducted monitoring in the deep aquifer.

Owasco Outlet and use of the POTW:

According to inspection reports for the Significant Industrial Users (SIUs) of Auburn's treatment plant in the 1980's, the past SIU companies included Alco Power, Inc., Auburn Steel Co., Central NY Bottle Co., Climate Control (Singer Co.), and Gulf & Western (aka General Products/TRW). (G&W also operated the TRW site in Union Springs.)

Gulf and Western tested its Outlet discharges for tetrachloroethylene. Gulf & Western operations at the TRW site in Union Springs led to the detection of organic solvents that were released and contaminated that site. Auburn Steel, and CNY Bottle had to sample its discharges for 1,1,1-trichloroethane. All facilities were sampled for oil and grease. Although we were not able to obtain the sampling data, it is routine to have companies sample for substances where there is a basis to expect that such substances are handled at the facilities and have the potential to enter the waste stream. Other industries on the Owasco Lake discharge system were Auburn Plastics, Dunn & McCarthy, Genesee Laboratories, Singer (Climate Control), and Hammond and Irving.

As early as 1974, the DEC ordered Auburn to eliminate wastewater overflow points to the Outlet from its sewer system. Also in 1974, as part of an I&I assessment of the system, Metcalf and Eddy noted "severe industrial odors" in a manhole in the vicinity of Genesee and Columbus. Bombardier and Columbia Rope had facilities in that vicinity. The substances giving rise to such odors were being discharged into the Outlet since Auburn has a SPDES permit for the discharge of such pollutants into the Owasco Lake Outlet. There is a history of CWA violations arising from Auburn's failure to get approval of its pretreatment program. EPA issued an order against Auburn in 1983. At that time, the Significant Industrial Users were: Alco, Auburn/Nucor Steel (now Austeel), Central NY Bottle, Climate Control, GE and Gulf & Western. The SPDES permit for the City includes TCE as a sampling parameter. Leachate from the Auburn Landfill was also sent to the POTW.

Specific industrial facilities:

American Locomotive Company ("ALCO") - Located at the corner of Columbus and Orchard. The site is now occupied, we believe, by the Bombardier facility. As early as 1967, the Department of Health (Syracuse Regional Office) documented the discharge of oils into the Owasco River from ALCO via discharges into storm sewers. ALCO provided a letter report to the Department. The pollutants were identified as lubricating oil, diesel fuel oils and "processed engine jacket water". The pathway was above and below surface grade into a trough which entered a sump and then a storm sewer. This trough also received up to 3500 gallons per minute of heat exchanger and water rheostat discharge water "carrying any pollutant through the existing collection pit". ALCO proposed to collect the oils and dispose of it through its industrial waste oil products hauler. ALCO also noted that machine turnings were sold to a scrap metal dealer who picked up the waste and hauled it in a "Dempsey Dumpster". The metal waste, however, also contained machine oils and this oil would "drip or spill" onto the concrete apron and were carried "by rain and drainage into the roadway catch basins". ALCO proposed to direct this runoff into a collection sump pit. Monitoring of ALCO discharge detected low concentrations of toluene and oil and grease. Metcalf and Eddy ("M&E") reported that diesel engines were reconditioned and stripped down and cleaned in detergent. They reported that the oils were skimmed from the washing liquids and disposed "outside the sewer system". M&E also reported that a "considerable amount of dirty oily wastes is continually dumped" into the Outlet. ALCO was listed as a Large Quantity Generator in RCRA printout.

Currier Plastics - 101 Columbus Street - Used solvents to wipe down steel molds - literature on the degreasers used at the facility confirm the presence of TCE. Currier Plastics responded to the 1988 Industrial Chemical Survey and identified TCE as a pollutant at the plant.

Auburn Steel - Nucor Steel (now Austeel) - Located in the far north border of the City on 25 Quarry Street. The facility generated steel scrap. In 1979 a leak from an on-site holding pond was causing pollution to Cold Springs Brook. Neighbors were complaining. Response to the 1983 ICS noted 1,1,1-trichloroethane and PCB waste streams. A 1986 monitoring report for the Publicly Owned Treatment Works ("POTW") indicated that Auburn Steel's wastewater contained 350 mg/l of oil and grease. Correspondence confirms the use of TCE in the mid 1990's. The company claimed that it used only 1 gallon per year and that it was wholly consumed and none was disposed. But Nucor Steel RCRA filings list Nucor as a Large Quantity Generator. Nucor is also listed as a transporter. (See, EPA ID# NYD066785650.) There is a 1993 Consent Order for minor RCRA violations at the facility, and a 1997 penalty for the unpermitted release of lime leachate from slag piles.

Auburn Technology Inc. - Now Bombardier, listed at 100 and 151 Orchard Street at the corner of Columbus Street (which, we believe, is also a location of a former ALCO plant). Documents confirm the use of TCE and PCE (tetrachloroethylene) prior to 1987. Waste solvents and other liquid wastes were accumulated in on-site tanks and shipped to off-site disposal facilities. Waste streams remained contaminated with these substances because of contact with sludge in an AST. Groundwater sampling showed the presence of PCE in 1992. (Spill reported - #9210287.) Conestoga Rovers conducted a site perimeter study, although it was focused on overburden and upper bedrock to a depth of 35 feet and never went deeper. The conclusion was that there was no off-site petroleum; but there was no basis to conclude anything with regard to subsurface

conditions deeper than 35 feet. The study did detect TCE, PCE and cis-1,2-dichloroethylene at 2900, 180 and 1300 ug/L, respectively. The company acknowledged to DEC the use of solvents

TRW Inc. in Auburn. – Located on Cranebrook Drive in Auburn. (TRW is related to Wickes Manufacturing Co.) Cranebrook Drive is directly north of Genesee Street. The facility was generating hazardous waste at least as far back as 1987. Manifests indicate the waste stream included toluene and 1,1,3-trichlorotrifluoroethane. Records on Environmental Oil letterhead from 1988 states: “drum pickup and pricing for Auburn facility”. (In 1988, Environmental Oil was also picking up waste from the Wickes facility in Union Springs, including waste ink, thinner and freon. That facility has a TCE groundwater remediation program.) There is a 1987 manifest of waste generated at Wickes Manufacturing at 1 Wickes Drive, Auburn, listing Ashland as the transporter. We believe 1 Wickes Drive is the same as Cranebrook. A record also seems to indicate that waste may have gone to solvents and petroleum on Brewerton Road, Syracuse. A 2000 manifest from TRW Auburn identifies 1,1,1-trichloroethane, and another identifies TCE and DCE as the waste streams. It is difficult to determine whether this is remediation waste from Union Springs or from active operations at the Auburn facility. The generator’s name is listed as TRW Auburn, but the State Generator ID is listed as 107 Salem, Union Springs.

TRWin Union Springs:

In or about 1931, General Products Company started manufacturing in the Village of Union Springs. The facility is located in the northern part of the Village.

At some point, during the 1960’s, Gulf and Western purchased the facility and General Products Co. and then operated the facility as the General Products Division of Gulf and Western. General Products manufactured auto ignition parts, thermostat plastic moldings and electrical equipment for internal combustion engines. (See the NYS Hazardous Waste Survey from 1977.) Plant processes included, light assembly, soldering and molding. The company listed molding plastic, flux, and hydraulic oil as waste products. The wastes were allegedly transported off-site to the Auburn landfill by Auburn Container or taken by local farmers (“gave 22 drums away to farmers for dust control”). As such, the records are clear that some of the facility wastes were spread on local farms for dust control.

As early as 1963, the Department of Health investigated complaints of oil floating on a creek located near the plant. The problem stemmed from allowing oil to flow directly to a ditch behind the plant. It was allegedly “corrected” after numerous attempts by skimming the oil off and siphoning it to 55 gallon drums. A small amount of oil was still permitted to enter the creek and DOH stated that “the oil from the plant in the amount being discharged would not have any direct toxic effect on fish life.” (See 1/22/1964 report.) In addition, the report notes that “The only other discharge from the plant is cooling water from the air compressors. Carbon tetrachloride from a vapor-phase metal degreaser is thrown on a dump, where it presumably evaporates.” Please note that carbon tetrachloride is a contaminant in the NPL site area.

Problems relating to the contamination of the pond continued into the 1970’s. An inspection in 1973 discovered a gasoline colored slick on the pond. It is unclear what steps were taken to stop the problem or investigate its scope and extent.

In 1980 there was a "massive cleanup" of 1,1,1-trichloroethane and ceres wax, which had been stored at the facility in barrels and accumulated for a number of years. (See, NYSDEC Hazardous Waste Disposal Survey 1984.) The barrels were thereafter disposed of by Cecos International, Inc. and taken to a disposal facility in Niagara Falls.

In the 1986 EPA preliminary site assessment, General Products identified trichloroethane, freon resin, ammonia, "degreaser" and cleaners as waste. (Also see, DEC Right-to-know Hazardous Waste Database.) The report notes that approximately 20 tons of waste solvents were generated.

In 1986 the DEC was notified that General Products' name was changed to Electrical Division, Wickes Manufacturing Company. (See 5/18/86 letter to DEC from Wickes.) (General Products may be connected to the current General Products Corporation located in Jackson, MI and Angola, IN which manufactures complex components for automobiles and trucks.) The records indicate that New York registered General Products Corporation was merged into Shondor Corporation in 1990. The letter indicates that Wickes was also operating the facility in Auburn. Wickes operated both facilities until it was purchased by TRW in 1990. Wickes stopped doing business as a New York corporation in 1990 and is currently listed as a subsidiary of Prentice Hall and Simon and Schuster, with a current process server address in North Carolina.

TRW took over the operations at the Union Springs facility in 1990. TRW's Electronics Division currently operates another facility in the City of Auburn, located at 2240 Cranebrook Drive, Auburn, NY 13021, 315-255-3311. TRW stopped operations in Union Springs in 1997. (See, Village of Union Springs history from Village web-site.) TRW manufactured auto parts at its facility in Union Springs and it used TCE as a degreaser.

Throughout the 1980's and 1990's the DEC hazardous waste manifests show the use and/or disposal of, *inter alia*, toluene, freon, flux, ink and thinner, TCE and DCE. According to undated notes (likely authored by a DEC employee), degreaser sludge was stored in barrels at the facility for many years. According to the notes, TRW, on its own, installed a dual phase system to address a soil contamination problem. In 1994, TRW stopped active remediation. After that, groundwater contamination was still noted. A March 14, 1996 letter from TRW to DEC details the work TRW had been doing at the facility. TRW had been monitoring outfall 001. In October 1995, testing indicated concentrations of VOCs above the action level of 5 ug/l. (See, letter dated 3/14/96). TRW began cleaning the catch basin and piping leading to outfall 001 in hopes of capturing residual contaminated sediment. (Letter dated 3/14/1996.) Re-sampling of the outfall in November 1995 indicated the presence of 4,700 ug/l of TCE and 880 ug/l of 1,2-DCE. (Letter dated 3/14/1996.) Based on these results additional sampling was conducted in an effort to determine the source of the VOCs. TRW's consultant at that time, O'Brien and Gere, identified a ground water seep located at the bottom of a slope of Mill Pond. (Letter dated 3/14/1996.) It was believed that the seep was the source of contamination and was collected and treated.

LPW Development, owned by Larry Ellis, Bill Ellis and Peter Marshall purchased the complex in 1998. (See, Village web-site.) LPW leased (and may currently lease) space to Soda Warehouse, Stott & David Motor Express and Finger Lakes Extrusion. In 1998, LPW offered to donate Mill Pond to the Village.

Auburn Plastics Inc. – Located at 24 McMaster Street. The manufacturing product was injection compression and extruded plastic components. The facility is listed on RCRA records as storing hazardous waste; the records indicate that the facility was subject to corrective action but the scope of the contamination is unclear from the records that we reviewed.

McQuay International/Snyder General Corp. - Auburn Technology Park. It may be relevant to note that this company was originally located at 62 Columbus Street and operated there from 1964 until 1992 when it moved to the industrial park. Columbus Street is north of Dunning. Low concentrations (0.001 mg/l) of PCE, TCE and 1,1,1-trichloroethane were noted in the City of Auburn's POTW monitoring file for McQuay. This may indicate use of these chemicals at the facility. A laboratory report from August, 2000 shows 1,2-dichloroethane in the company paint sludge. While at the Columbus Street location, the City served a notice of violation on the company, including a violation for discharging wastewater from paint drum cleaning and paint system flushing to an open grate that lead to the City sewer. There was also an open drain to the sewer in the storage room which contained adhesives, thinners and paints. An inspection by O'Brien and Gere in 1990 identified a rinse water storage tank which "continuously overflows to the sewer". McQuay's wastewater discharge permit contained effluent concentrations for TCE, PCE and 1,1,1-trichloroethane. A letter written to OSHA in 1995 alleges the dumping of paint thinner and TCE into the sewer and/or dumpster.

Auburn Prison – Located along State Street, the facility manufactures motor vehicle plates, furniture, and signs. The facility claimed that it did not discharge industrial waste into the sewer system, although the industrial chemical survey ("ICS") lists the waste stream as gas, oil and various solvents. The facility confirmed the use of solvents and was a RCRA SQG.

Simplex Manufacturing – Located at 105 Dunning Avenue. Production of leather packing and flag poles. Correspondence confirms use of TCE at least during the years 1978 through 1983. It purchased TCE from Scobell (Raeco), a site in DEC Region 9 that was on the inactive hazardous waste site registry. The company claims TCE was used in its vapor degreasing machine.

Nalge Co. Tubing Products Dept. – Located at 16 Garden Street, formerly Sybron Nalge,-- a DEC record indicates that Nalge generated waste between 1952 and 1976. The waste codes were D001 and D008. The disposal location is listed as "unknown local roads around Auburn"; the transporter name is listed as "unknown Local Farmers". This company may also be located with the Genesee Laboratory because it has the same address. The POTW records indicate that it produced and/or used plastic rods, tubes, vinyl resin and plasticizers. The documentation further supports the use of waste by farmers as noted earlier with General Products.

NYSEG – Located at 73-79 Wright Avenue included offices, plus vehicle and electric equipment maintenance and welding. Identifies use of 1,1,1-trichloroethane in its response to DEC ICS.

Creative Electric – Located at 23 North Division Street, generated waste containing TCE and MEK.

Singer/Climate Control – Located at 62 Columbus Street. Air conditioning and heating equipment. (Facilities on Columbus Street are on the road which is north of Dunning and becomes Dunning when it crosses Genesee Street) The waste stream appears to be mostly metals.

New York Central Bottle Company (Division of Phillip Morris) - Located on Route 6 in Sennett, north of Auburn. Discharged oil and grease to the POTW.

DW Diesel - Located at 1503 Clark Street. Moved to Town of Aurelius from the City of Auburn in 1979. The company acknowledged in correspondence that it used degreasers and thinners with various production operations, such as parts cleaning, immersion cleaning and paint thinning. Denies that the degreasers contained the TCE, but documents provided confirm presence of PCE and 1,1,1-trichloroethane. Company says that between 1981 and 1988 its immersion cleaning solution was rinsed off of some parts "in a sink that led to a dry well". The facility was listed as Conditionally Exempt Small Quantity Generator on RCRA filing.

Goulds Pump - Located on Route 326 and Goulds Drive. Responded to DEC letter confirming use of solvents but denying the use of TCE. The company claimed that its waste streams were transported off-site. Goulds is a RCRA SQG.

Columbian Rope Co. (we believe that this company no longer is in existence) - There are a number of different addresses for this facility (309 Genesee St. and 1 Columbian Drive). There is no specific information on TCE usage. The principal product was ropes, twines, insulated bags, extruded and molded products. Industrial waste disposal consisted of mostly mineral oil that was discharged to the sewer. In the past it had discharged spent caustic solution into Dunning Brook.

Additional Potential Sources:

The following companies used degreasers/solvents but claimed only off-site shipment of waste and no use of TCE:

Bo-Mer Mfg. Co. (Bo-Mer Plastics) - Located at 13 Pulaski Street. The records indicate waste oil and MEK in the waste stream.

Hammond and Irving - Route 34 (northern part of Auburn). RCRA SQG.

BUSINESSES WITHIN THE NPL SITE WITH POTENTIAL FOR CONTAMINANT RELEASES

Filtrec Corp.
5440 Lockwood Rd.
Auburn

Dan Marion Roofing
2035 Pinckney

Garlock Equipment Company
Bluefield Road
In business since 1961 - roofing business

Daniel Lisano
5815 Dunning Ave.

TV Antenna Specialists
5729 Bluefield Rd.

White Dealership - Cayuga Oliver
Pinckney Road

Wayne Farms
6410 Half Acre

BUSINESSES PRESENT IN THE 1950's (Sanborn Map information) WITH POTENTIAL FOR
CONTAMINANT RELEASES:

1955 Sanborn Insurance Maps
Index of Companies in Auburn, NY

A&R Paper & Metal Storage	page 64
Adams & Browne Oil Co., Bulk Station	page 83
Alco Products Corp., Diesel Engine Div.	page 55
Aluminum Marine Shipping Hardware Co., Machine Shop	page 45
Atlantic Refining Co.	page 63
Auburn Button Works	page 44
Auburn Cement Products	page 16
Blue Moon Coal Co.	page 49
Bowen Products Corporation, Lubrication Devices	page 10
City Fuel Co.	page 5
City of Auburn Garage	page 11
Clapp, E.D. Mfg. Co., Auto Forgings Mfg.	page 58
Columbian Rope Co., Metallic Prods Div.	page 10
Connor, R.J., Oil Co.	page 47
Cuddy & Gehrin Coal Yard	page 51
DiFabio Coal Co.	page 57
Groves Home Laundry	page 38
G.L.F. Bulk Station	page 82
Hammond & Irving, Inc., Tool Steel Manuf.	page 83
Herschell R. Mfg. Co.	page 51
International Harvester Co.	
New Process Gear	page 45
NYS ED Garage, Storage repair shops	pages 13, 49
New York Telephone Co.	page 58
Nye-Wait Co. Rug and Carpet Factory	page 81
Remington Corp.	page 45
Shoemaker Coal Co.	
Simplex Mfg. Co. Mechanical Goals	page 11
Texas Co. Bulk Station	page 82
Town of Owasco Garage	page 76
U.S. Hoffman Mach. Corp	page 45
Ward, G.J. Bulk Station	page 82

Location	Page Number	Address	Facility (Name or Type)
Center of City	1	47 Wall	Auto Body Shop
		67 Wall	Filling Station (Gasoline Storage at prison)
	2	56 VanArden	Private Garage
		64 VanArden	Auto Repair
		21 Wall	Auto Repair
		25 Wall	Troy Steam Laundry
	3	38-40 Chapel	Auto Repair
	4	38-40 Garden	Auto Repair
		32 Garden	Dry Cleaning
		4 Garden	Dry Cleaning
		8 Garden	Filling Station/Greasing
		15 Garden	Plastic Molding Mfg.
	5	35 Clark	Dry Cleaning
			City Fuel Co.
	6	38 Clark	Auto Repair
		54 Clark	Filling Station
		159 Genesee	Sears Roebuck
	8	28-34 Genesee	Manufacturing Shops
	9	10 ½ Lincoln	Filing Station
	9A	9 Lincoln	Auto/Laundry
	9D	34-35 Dill	Auburn Publishing Co.
		14 Dill	Filing Station
	10		Barbara Jay Footwear Inc.
		Off of Canal	Bowen Products Corp.
		Off of Canal	The Hunting Co. (Whol. Plumbing)
		34 E. Genesee	Filling Station
	11	3 Market	Dry Cleaning
		78 North	Filling Station

Location	Page Number	Address	Facility (Name or Type)
		Off of North	Auto Repair Shop
		15 Seminary	Used Auto
		5 Franklin	Filling Station
		4 Franklin	City of Auburn garage
		13 Seminary	Filling Station
		45 Market	Auto Sales & Service
	12	6 Seminary	Auto Repair
	13	Nelson	City of Auburn Garage
		74 Seminary	Gas Regulatory Station
		84 Seminary	Filling Station
South of Center of City	33	17 ½ Logan	Sheet Metal Shop
		28 Logan	City of Auburn Water Dept.
		38 South	New York Telephone
	35	1 Mary	Dry Cleaner
		Miller	Auburn Sanitation Dept.
	39	48 ½ Steel	Polishing Clothes Mfg.
North of Owasco Lake	41	60 Division	Dry Cleaner
Northwest of Center of City	43	109 VanArden	Auto Repair Shop
North of Powerex	44	Off Canoga Street	Auburn Plastics Inc. - Canoga Plant
			Auburn Armature Co.
North of City and River	45	Off Frank Smith Avenue	U.S. Industrial Development Foundation
		203 North	Mutual Candy Co.
		201 North	C.W. Buster & Son
	46	23 Perrine	Samuel Schwartz & Sons Junkyard
			General Crushed Stone Inc.
	49	141 Clark	Filling Station
		18 N. Division	NYE & WAIT Co., Inc.

Location	Page Number	Address	Facility (Name or Type)
South of Owasco River, West of Auburn	51	Off McMaster	Auburn Plastics
		Off Washington	Cayuga Cordage Mfg. Co.
			Sears Roebuck
		46-52 Washington	Procino & Rossi Corp. Macaroni Factory
		Off Washington	Cuddy & Geherin Coal & Ice
		81 Clark	Filling Station
		corner of Clark & Washington	Lengh Valley RP Freight Station
	52	202-204 Genesee 180-188 Genesee	Former Greens & Wicks Buildings
	53	42B Orchard	Auto Repair
		40 ½ Orchard	Filling Station
		112 Clark	Farm and Machinery Sales
	55	Corner of Monroe & Orchard	Alco Products, Inc. Diesel Engines Div.
	57	Columbus & Kelsey	Electromode Remington Div. of Singer Co.
		243 Hardenbergh	Auto Repair
	58	Genesee	E.D. Clapp Coal Co.
		Pearch & Hardenbergh	New York Telephone Co.
	61	90 Dunning Avenue	Filling Station
	62	Genesee	Columbian Rope Co.
	63	Garfield	Stodan Corp. Trucking
	64	45 Aurelius Street	Gleason Avery Inc. Mfg. Temperature Controls
	65	53 Colombus	Agway Home & Garden Center
		Wright Avenue	Red Star Express Lines Co.
	66	Lafayette Place	Singer Co., Climate Control Division
	81	N. Division	Nye Wait Co. Rug and Carpet Factory
		26 Aurelius Avenue	Shoe Form Co., Inc.

Location	Page Number	Address	Facility (Name or Type)
	82	State	NYS Electric & Gas
		York	Ashland Oil Co.
		York	Auburn Spark Plug Co.
		York	Cayuga County Highway Department
		York	Filling Station
		State	Filling Station
		State	Texas Co. Bulk Storage
	83	North	Hammond & Irving Co. Tools/Steels
			City Fuel Co. Bulk Station

WASTE HAULERS IN AND AROUND THE NPL SITE:

Northeast Environmental Services

Rainbow Rubbish - Moravia

Tonawanda Tank Transport

Solvents and Petroleum Serv.- Syracuse

Ashland Chemical Co. - Binghamton

Rainbow Rubbish Removal

George Lumb

Auburn Sanitation Trust

Rubbish Removal

Auburn Container

Crandell Trucking

Grady's trash removal

Jeff Polhamus

Tom Molloy

N&W Trucking

Jim Barber

Tom Lynch

D&L Disposal

Lewis Haggett

Auburn Container Corp.

CONCLUSION:

It is clear that halogenated compounds were used in many of the facilities that operated in Auburn adjacent to, near and inside the NPL Site area. These facilities, however, never conducted an investigation of the deep aquifer as was undertaken by GE.

ATTACHMENT DOCUMENT 2 – PRP DOCUMENTATION

OTHER POTENTIAL SOURCES OF NPL SITE CONTAMINATION:

1. Town Line Road Dump: - DEC Registry Site Code #706007 is a 20 acre rural site (Springport) adjacent to a former municipal landfill. The area of the former landfill was turned into a corn field with debris sticking out. It is alleged that General Products (Wickes, TRW) dumped TCE and waste oils. GE is also a PRP at the site. Nearby residential well was impacted by TCE, DCE and VC. When the disposal site was closed, there was a lot of scavenging from the dump. It was owned by Karl Shank, run by a fellow named Parkinson and then one of the Doody families purchased it. There is a deep quarry about 600 feet from the landfill. RCRA Environmental noted that natural gas drilling companies were often pumping water from the quarry for drilling gas wells throughout the area. RCRA Environmental noted that General Products' wastes were dumped nearby. A General Products' employee who knew of dumping at the site, including TCE drums, is a man named Robert Smith. Miller Brewing Co. was also drilling next to the Town Line Dump. There is a permit record that discusses what happens if the drilling hits a salt water formation - the document states: "salt water will be injected through the annulus to the salt water formation or transferred to the Miller Pit located at the compressor station for use by the County". It is unclear whether the quarry water was contaminated by General Products waste TCE, but if it were, the injection of this quarry water throughout the NPL site area is an interesting source issue that was never pursued. There is a gas well directly to the east of Overbrook Drive, and concentrations at Overbrook were never reconciled with the field data to the south of the Powerex Site.

2. Union Springs Contamination Sources include the Academy Dump, the Village Dump, and the TRW/General Products facility. General Products generated TCE wastes. The TRW facility in Union Springs was used by General Products, Gulf and Western and then Wickes manufacturing. The site was acquired by TRW in 1990. The facility was the source of TCE and 1,1,1-trichloroethane. Soil and groundwater contamination was caused by releases at the facility. Concentrations of TCE were detected in Mill Pond adjacent to the facility.

3. RCRA Filers Adjacent to or in the NPL Site Area

LQG - Large Quantity Generator
SQG - Small Quantity Generator
CQG - Conditionally Exempt Small Quantity Generator
X - Transporter

X	West Central Environmental
CQG	Agway Energy Products
LQG	ALCO Power Inc.
CQG	Amerada Hess Station
CQG	Auburn Armature Inc.
CQG	Auburn, City of - Emerson Park Oswasco Lake
SQG	Auburn, City of - Landfill

CQG	Auburn City of Solids Handling Building
X	Auburn Container Co.
SQG	Auburn Housing Authority - Melone Village
SQG	Auburn Memorial Hospital
SQG	Auburn Tank & Manufacturing Co., Inc.
X	Barr Transportation Corp.
SQG	C&G Auto Sales
CQG	Camtech Precision Inc.
CQG	Cayuga-Onondaga BOCES
CQG/X	Environmental Products & Services Inc.
CQG	Expert Tire
X	Filtrec Corp.
SQG	Fox Chevy Olds Cadillac
SQG	Fox Chrysler Plymouth Dodge, Inc.
LQG	General Electric - Auburn Plant
SQG	Goulds Pumps Inc. Water Systems
CQG	Green & Bryant Repairs, Inc.
SQG	H&L Ford, Inc.
SQG	Hammond & Irving, Inc.
LQG	Hanson Auburn
SQG	Hanson Oakwood
CQG	Harrys Tire & Supply, Inc.
CQG	Harry Tune & Lube
SQG	Kwik Fill
CQG	Mack Studios Displays, Inc.
CQG	Main & Pinckney Equipment, Inc.
CQG	McQuay International
CQG	Mier Tool Co.
LQG/X	Nucor Steel Auburn Inc.
SQG	NYS Department of Correctional - Auburn
SQG	NYSEG - Auburn City Gate Regulator Sta
LQG	NYSEG Auburn Service Center
LQG	Owens-Brockway Glass Container
CQG	R P M Industries
X	Red Star Express Lines of Auburn, Inc.
SQG	S L Auburn, Inc.
CQG	Schott-Fostec LLC Fostec Division
SQG	Simkins Body Shop
CQG	Stott & Davis Motor Express
SQG	Sunbrite Cleaners, Inc.
CQG	Sunoco Service Station
SQG	T R W Automotive
SQG	Toms Body Shop & Auto Sales
CQG	U-HAUL Auburn
CQG	Valvoline Instant Oil Change

CQG Wal-Mart Supercenter
X West Central Environmental
CQG Ameranda Hess Station

4. Spills & Unpermitted Disposal Adjacent to or in the NPL Site Area

DOT Facility located on Dunning Ave. (Dunning is East of Overbrook) – there was a tank failure in 1987 with impacted groundwater. The tank was alleged to be more than 40 years old and the spill was designated as: Spill #86-05994. There was also another spill number from a tank test failure in 1989, designated as: Spill #89-07293. There as another spill in 1997, designated as Spill #97-06089. The tank failure contaminated soils and the spill was found during the removal of another underground tank.

Auburn Steel – located on Quarry Road - Spill reports from 1979 noted allegations of drum burial of water treatment chemicals, although the records we reviewed did not reflect the discovery of such drums. In 1995 a sump broke that led to the pumping of facility contact water being discharged outside onto the lawn and in 1996 there was an overflow from the holding pond, and in 2000 there was a vehicle fuel leak.

(The above is not an exhaustive list of petroleum spills – more spills are listed in attached Document 3)

FOX Automobile Dealerships - FOX auto dealerships are located on Genesee St. and on Grant Avenue. The Chevrolet & Chrysler locations were listed as SQGs. There was a related residence which is also listed on the EPA RCRA filing list located at Route 5 and 20 in Aurelius (see midnight dumping below). A 1996 spill report concerns the Fox Chevy dealership (now moved) at the corner of W. Genesee St and Bluefield, immediately across the road from the former Powerex facility. Waste storage tanks were found during the bank's due diligence assessment of the property. Storage tanks had leaked and soils were contaminated. A drywell was discovered on the property. (In fact, a DEC employee had suggested that this drywell should be looked at more carefully in terms of the NPL site). Another Spill was reported at the Fox Auto Dealer on Genesee St. (same location) in 1997. The spill was of waste oil. The spill report notes: "Caller reported that "spills have occurred to floor drains and drywell for period of years". This location is now the City of Auburn Highway Garage and is covered with vehicles and has truck repair bays.

There are also 2001 spill reports for property near the former Columbian Rope site on Genesee Street near Dunning and on Cranebrook (north of Powerex) on Cayuga County IDA property.

Midnight dumping on Route 20 - A County engineer document states: "location of midnight disposal has been established to be the site of what was a stone house on Route 20 near Finger Lakes mall. About 300 gallons of a solvent was dumped.

Panek Property - Canoga Road - Aurelius - Disposal of tires and 55 gallon drums. DEC became aware of this site in 1996.

Tele-K Site - This site is located on Canoga St., north of Route 20/5, along the Owasco Outlet. The site is abandoned and partially burned. Approximately 400 drums of "flammable, hazardous substances" have been found. EPA is aware of the site and, we believe, conducted a removal action at the facility. We do not know whether there was any groundwater investigation conducted.

Potential disposal in forested lowland on Overbrook - A DEC internal meeting outline references that a drum disposed of to the east of Overbrook could cause the problem detected in the groundwater. The outline section is titled: "Surface Dumping around Overbrook Drive" and was written by Will Welling to Larry Lampman: "A drum or two poured into a forested low area could be a (or the) source". (To the extent that the DEC acknowledged that the area to the east of Overbrook could contain a source, it is worth noting the contamination in EPA 11 and EPA 14 and the theoretical use of Town Line Road quarry water by the well driller whose gas well is situated between the two EPA monitoring wells.)

Re-Ho-Both Enterprises Site - located on Town Line Road, Aurelius - this is not the Town Line Road dump - it is approximately 5000 feet to the North. It is a site listed in DEC's 1995 "hazardous substance site" study. The site is described as an old quarry on the north side of the road which is visible from a 1963 aerial photo. DEC says an anonymous source claims that drums were buried there. Suspected PRPs were Dunn & McCarthy and Climate Control. The site was nominated for Registry listing by Bruce Natale.

5. Septic Systems - The homes and farms immediately outside Auburn use septic systems for sanitary waste. There is evidence of septic system failure at one of the Pinckney family homes on Pinckney Drive. An e-mail between Jack Harmon and Eileen O'Connor notes that "coliform counts have been drastically reduced by the disinfection. The Pinckney residence is down to 3 colonies per 100ml..."; this correspondence, however, is a reflection of septic system failure on Pinckney. Further, there are at least 4 trailer parks in the area around the NPL site. Each trailer is likely to have its own heating oil tank and the trailer parks are likely to have extensive septic systems that could be reviewed for assessment as groundwater contaminant sources. The County Sanitary Code requires inspections of the systems by the Towns.

6. Auburn Dry Cleaners

Clean-n-easy Dry Cleaners - located at 66 Owasco Street - listed as a conditionally exempt small quantity generator on RCRA filing

Sunbrite Cleaners - located at 64 Franklin Street - listed as small quantity generator on RCRA filing

Custom Cleaners - located at 80 North Division Street - note from DEC record reflects use of solvent - correspondence from Cleaner says it used PERC until 1999 - listed as small quantity generator on RCRA filing.

7. Junkyards/Junk cars:

There are a number of junkyards in the Northwestern section of Auburn. At least 4 are identified in prior reports. DEC did not have "fluid reports" from any of the facilities. Visual observation

confirmed that on roads from Auburn to Union Springs there are abandoned rusty storage tanks, rusted abandoned cars, an abandoned truck repair business on Route 326 , and an automobile painting facility on Route 326. There is also an auto mechanics repair shop at 1967 Pinkney Road, right next to a small tributary.

CONCLUSION:

There have been and remain many potential facility sources of groundwater contamination adjacent to and throughout the NPL Site area that were never seriously assessed as contributing to the groundwater contaminant condition despite the likelihood that the chemicals of concern were used by and at such facilities.

ATTACHMENT DOCUMENT 3 – PETROLEUM RELATED PRP DOCUMENTATION

Petroleum and/or Automobile/Tractor Repair Related Spill Sites

1. Fox Chevrolet Inc. - 366 Genesee Street (Corner of Bluefield and Genesee)
 - DEC Spill Report Site;
 - In June of 1996, rusted and leaking waste oil storage tanks removed;
 - Soil contaminated and excavated;
 - Formerly listed as a RCRIS large quantity generator;
 - Dry well located on the property - reports of disposal into dry well;
 - Other Fox dealerships have listed DEC Spills in Auburn;
 - Location was purchased by City of Auburn and is currently the City of Auburn Garage.
2. City of Auburn DPW - Corner of Genesee and Bluefield
 - Aboveground storage tank on site;
 - Large maintenance and storage facility for city trucks and heavy equipment;
 - Likely to handle and store petroleum, waste oils and degreasers.
3. New York State Department of Transportation Facility - 151 Dunning Avenue
 - Site is a RCRIS small quantity generator;
 - Leaking Tank Site - leak from 4000 gallon tank;
 - Product released from tank - tank observed to take on water;
 - Groundwater impacted;
 - Site had underground and aboveground storage tanks;
 - 152 Dunning Avenue location also DOT - Contaminated soil discovered as a result of tank failure in 1997.
4. Mobil Oil Corp. - 301 Genesee Street
 - RCRIS small quantity generator;
 - Underground storage tank;
 - Former petroleum spill site.
5. QuickFill - 302 Genesee Street
 - RCRIS small quantity generator
6. Tarby's Citgo - 304 West Genesee Street.
 - Underground Storage Tanks ("UST");
 - Leaking tank site;
 - Contaminated soils discovered during tank removal.
7. UHaul - 256-260 West Genesee Street
 - UST site;
 - Leaking tank site;
 - Waste oil found in soil during tank removal in 2000;
 - Tanks removed on January 28, 2000 - concentrations of contaminants from under the fuel

- oil tank were "high";
 - NYSDEC Spill Report for site;
 - Conditional Exempt Small Quantity Generator
8. West Side Gas and Go - 304 West Genesee Street
 - UST site;
 - Four underground storage tanks containing various fuel and waste oils.
 9. Red Apple Food Mart - 302 Genesee Street; Corner of Genesee and Dunning Avenue
 - UST site;
 - Gasoline spill in 1993.
 10. Pepsi Cola Beverage Company - 347 West Genesee Street
 - Underground storage tanks.
 11. Mobil Station - Corner of Columbus and Genesee Street
 - UST site;
 - Gasoline spill in 1991;
 - Sheen appeared in creek behind the station;
 - NYSDEC monitored response action performed;
 - Gas fumes found in sewer on corner of Columbus and Genesee - site suspected as source of off-site vapors.
 12. Genesee West Transformers - 309 West Genesee Street
 - Spill in January of 1990 when vandals spilled oil from transformers;
 - Various other spills of PCB oil from transformers.
 13. Auburn Party Rental - 318 West Genesee Street
 - 55 gallon drum containing waste oil spilled in August of 1999.
 14. Highway Oil Incorporated - Corner of Genesee Street and Bluefield Road
 - Across street from GE Facility;
 - Dilapidated appearance;
 - UST site;
 - Listed on RCRA filer list without description;
 - Possible site of former Pinckney tractor repair location - fluids and degreasers would have been stored and handled.
 15. Junkyards and trailer parks
 - two trailer parks to Northwest of GE Facility, one in close proximity to sink hole to the northwest of Powerex;
 - trailer parks likely to have extensive septic system areas - risk of uncontrolled disposal of household products into septic system;
 - junkyards, in general, traditional contaminant sites in New York State - junkyards in State

- have been listed on inactive registry (DEC has a report on scrap and junk yards, in general, as sources of contamination in the State);
- fluids and contaminants from junk in uncontrolled setting;
 - There is a trailer Park site on Reister near where it meets Dunning Avenue, east of MW 14 and MW 11.
16. Custom Cleaners - 80 N. Division Street
 - Small Quantity Generator;
 - Use of solvent;
 - Identified by DEC as potential source of organic groundwater contamination;
 - Correspondence from company confirms use of PCE.
 17. Cayuga Oliver Farm Equipment and Supplies - Pinckney Road - A/K/A "White Dealership"
 - 2035 Pinckney Road;
 - Tractor repair business;
 - Expected use of solvents and degreasers;
 - Owned by Pinkney Bros. - (may be the relocated facility from the Highway Oil Site);
 18. Repair Businesses on Pinckney Road
 - Tractor repair business conducted by the Pinckney family;
 - Automobile repair business conducted by Baity;
 - Repair shops likely to have degreasers – historic disposal to septic systems;
 - One of the Pinckney homes had a septic system failure.
 19. Main and Pinckney Equipment Inc. - Mutton Hill Road
 - Listed as Conditionally Exempt Small Quantity Generator;
 - Retailers of farm equipment and supplies;
 - Tractor repair location which generates solvents
 20. Alcara Machinery Inc. on Oakwood Road
 - Storage and handling of degreasers and petroleum.
 21. Garlock Equipment Company - Located on Bluefield about a mile down from Genesee
 - Roofing company in business since 1961;
 - Site is near one of the sink holes
 22. Oakwood Service Center - automobile service center - corner of Route 326 and Oakwood
 - Sold and repaired tractors;
 - Underground and aboveground storage tanks;
 - Likely handling and storage of fluids and degreasers;
 - Currently a filling station.

23. Midnight "dumping"
- Location of midnight disposal at the site of what was a stone house on Route 20 and what is now the Finger Lakes Mall.
 - 300 gallons of solvent dumped

Additional Location - According to DEC, a drum or two poured into a forested low area to the east of Overbrook could be a [or the] source. (March 1, 2001 DEC document.) There are also the documents with regard to waste being used by local farmers as dust suppression.

24. DW Diesel - 1821 Clark Street (possibly 1503 Clark Street)
- Use of TCE discharged to drywell;
 - Use of degreasers and thinners;
 - Confirmed presence of PCE and 1,1,1, trichloromethane;
 - Conditionally Exempt SQG;
 - Identified by DEC as potential source of groundwater contamination.
25. Creative Electric - 23 N. Division Street
- Small quantity generator;
 - generates waste containing TCE and MEK;
 - Identified by DEC as potential source of groundwater contamination.
26. Paul Schenck Garage - 6160 Oakwood Drive
- Possible use of petroleum products, solvents and degreasers;
 - Former Aurelius supervisor.
27. White Dealership - 2035 Pinckney Road (see Cayuga Oliver tractor notations)
- Owned by Pinckney Bros.;
 - Tractor repair;
 - Possible use of petroleum products, solvents and degreasers.
28. Area next to Lockwood Farm - 1877 Route 326
- Junkyard next door to farm - Tratt(?) Junkyard;
 - Junk tractors and equipment debris in yard;
 - Likely presence of fluids;
 - Lots of abandoned cars.
29. O'Hara Tractor Repair - off 326 - Chamberlain Road
- Storage and handling of fluids and degreasers.
30. Tele-K Site/Taurus Chemical - Canoga Street, north of Route 20 South, along the Owasco outlet, just west of Bradley Street. Site was former plastic extrusion plant that burned to the ground in 1995.
- Drums containing hazardous waste and flammable fluids abandoned on-site.
 - Drums left unprotected for approximately 10 years
 - US EPA removal action

31. Minde Garage - East of Overbrook on Dunning, 5761 Dunning in the Town of Fleming
 - Former Aurleius Town Supervisor called Mr. Minde a "renegade."
 - Owned tractor and truck repair shops.
 - alleged to have dumped solvents and fluids onto the ground - sloppy operation.
 - Tractor and truck repair and maintenance requires storage and handling of degreasers.
32. Filtrec Corp. - on 5440 Lockwood
 - Listed as - RCRA transporter;
 - Imported and sold oil products.
33. Dumping Location next to Filtrec
 - alleged dumping by County Lab;
 - possibly formaldehyde.
34. Doody Farm - 5541 Large Road (Fleming)
 - Owned the Town Line Dump site;
 - Possible AST or UST on farm property;
 - tractor repair and maintenance to farm equipment.
35. Richard Sylvester Jr. - Father was Edward Panek - waste hauler
 - Property on Canoga Road;
 - Disposed of fuels and 55 gallon drums found on property;
 - Panek ran junkyard by the Finger Lakes (Auburn) mall;
36. George Vanbe farm - 5774 Dunning
 - Possible UST storage tank;
 - Farm equipment repair and maintenance;
 - UST location